

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

GRAHAM ANDERSON, on Behalf of Himself) and All Others Similarly Situated,) Plaintiff,) v.) POLYMEDIX, INC., NICHOLAS) LANDEKIC, EDWARD F. SMITH, and R.) ERIC MCALLISTER,) Defendants.) _____)) Case No. 2:12-cv-03721-MAM) <u>CLASS ACTION</u>) LEAD PLAINTIFF'S MOTION FOR) FINAL APPROVAL OF CLASS ACTION) SETTLEMENT AND THE PLAN OF) ALLOCATION
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TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on April 30, 2015, at 10:00 a.m. or as soon thereafter as the matter may be heard before the Honorable Mary A. McLaughlin, Judge of the U.S. District Court for the Eastern District of Pennsylvania, 601 Market Street, Courtroom 13-A, Philadelphia, Pennsylvania 19106, Lead Plaintiff¹ PolyMedix Group will move for an order granting final approval of the Settlement as set forth in the Stipulation, pursuant to Rules 23(a), (b)(3), and (e) of the Federal Rules of Civil Procedure. Lead Plaintiff hereby applies for entry of the [Proposed] Final Judgment and Order substantially in the form of Exhibit B attached to the Stipulation and submitted concurrently herewith, requesting the Court to: (a) determine whether the proposed Settlement of the Action on the terms and conditions provided for in the Stipulation is fair, reasonable, and adequate to the Settlement Class and should be approved by the Court; (b) determine whether a Judgment as provided in the Stipulation should be entered; (c) determine

¹ All capitalized terms not otherwise defined herein shall have the same meaning as set forth in the Stipulation of Settlement dated December 23, 2014 and filed with the Court on January 9, 2015 ("Stipulation") (Docket #53).

whether the proposed Plan of Allocation should be approved; and (d) rule on such other matters as the Court may deem appropriate.

This Motion is based on the Stipulation, this Motion, the accompanying Memorandum of Law, the supporting Declarations of Stephen J. Oddo, Richard A. Maniskas, Peter H. Burge, and Graham Anderson submitted herewith, all pleadings and papers filed in this action, the arguments of counsel, and any other matter that the Court may consider at the hearing on this Motion.

Date: March 23, 2015

RYAN & MANISKAS, LLP

/s/Richard A. Maniskas

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CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Court's electronic mail notice list.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed March 23, 2015.

/s/ Richard A. Maniskas

RICHARD A. MANISKAS (PA #85942)